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12 | Attorneys for the Saxe Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

16 JEREMY BAUMAN, et al.,

Plaintiffs,

18 || VS.

Case No. 2:14-cv-01125-RFB-BNW

19 DAVID SAXE; et al.,

Defendants.

**SECOND UNOPPOSED MOTION TO
CONTINUE STAY**

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Plaintiffs

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In consolidation with
Case No.: 2:14-cv-01160-RFB-BNW

24 DAVID SAXE; et al..

Defendants.

UNOPPOSED MOTION

The Saxe Defendants¹ and Plaintiffs Jeremy Bauman and Bijan Razilou jointly move the Court to enter the following Order continuing the staying this case for a period of 14 additional days while they execute a written settlement agreement memorializing the settlement reached at the mediation on May 15, 2019, and to allow Plaintiffs to file their motion for preliminary approval of the class-wide settlement. The Saxe Defendants and Plaintiffs are informed and understand that Twilio does not oppose this motion. In support of their request, the Saxe Defendants and Plaintiffs represent the following:

1. On May 15, 2019, the Saxe Defendants and Plaintiffs participated in a mediation on May 15, 2019, and reached an agreement in principle to resolve this case on a class-wide basis.

2. On July 24, 2019, the Saxe Defendants and Plaintiffs filed an Unopposed Motion to Continue Stay, asking the Court to stay this matter until August 23, 2019, and to suspend all case-related deadlines and activities, to allow the parties time to finalize their written settlement and to prepare and file a motion for preliminary approval of that settlement.

3. The parties negotiated, exchanged numerous drafts of, and ultimately finalized a written settlement agreement, pursuant to which Plaintiffs intend to present the Court with a motion for preliminary approval of a class-wide settlement of this case. However, due to client and counsel travel, the parties need a brief additional continuance to obtain signatures and to prepare and file the motion for preliminary approval. The parties anticipate this process will be complete by no later than September 6, 2019.

4. In the interest of avoiding expense to the parties and conserving the Court's resources, the Saxe Defendants and Plaintiffs jointly request that the Court continue the stay in this matter for an additional 14 days, to September 6, 2019. To that end, the Saxe Defendants and Plaintiffs request that the Court enter the accompanying Order.

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¹ The Saxe Defendants are V Theater Group, LLC; Saxe Theater, LLC; David Saxe Productions, Inc.; David Saxe Productions, LLC; Saxe Management, LLC, and David Saxe.

1 Stipulated to and respectfully submitted this 22nd day of August 2019, by:

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1 **ORDER**

2 Having considered the Saxe Defendants' and Plaintiffs' Second Unopposed Motion to
3 Continue Stay, and good cause appearing therefore, the Court hereby GRANTS the Unopposed
4 Motion. This case shall remain STAYED until September 6, 2019. By no later than that date,
5 either a motion for preliminary approval of settlement shall be filed or a Joint Status Report shall
6 be submitted to the Court proposing how this matter will proceed.

7 IT IS SO ORDERED.

8 DATED: September 6, 2019



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10 RICHARD F. BOULWARE, II
11 UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

2 I hereby certify that on August 22, 2019, I caused the foregoing to be electronically filed
3 with the Clerk of the Court using the CM/ECF system which will send notifications of such filing
4 to all counsel of record as of the time of the filing.

/s/ James Harlan Corning
James Harlan Corning

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